

FILED ENTERED
LODGED RECEIVED

SG MAY 25 2016

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
DEPUTY

16 MS-00073 RSL

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DZ BANK AG DEUTSCHE ZENTRAL-) Case No. 3:14-cv-05880-JLR
GENOSSENSCHAFTSBANK a/k/a DZ)
BANK AG DEUTSCHE ZENTRAL-)
GENOSSENSCHAFTSBANK,)
FRANKFURT AM MAIN, NEW YORK) APPLICATION FOR WRIT
BRANCH a/k/a DZ BANK AG) OF GARNISHMENT
DEUTSCHE ZENTRAL-)
GENOSSENSCHAFTSBANK,)
FRANKFURT AM MAIN a/k/a DZ BK AG) Misc. Action No.
DEUTSCHE ZENTRAL NY BR a/k/a DZ)
BANK AG a/k/a DZ BANK,)
Plaintiff,)
v.) Clerk's Action Required
CONNECT INSURANCE AGENCY, INC.,)
Defendant.)
PROGRESSIVE NORTHWESTERN)
INSURANCE COMPANY,)
Garnishee Defendant.)

APPLICATION FOR WRIT
OF GARNISHMENT -- 1

ROBERTS JOHNS & HEMPHILL, PLLC
7525 PIONEER WAY, SUITE 202
GIG HARBOR, WASHINGTON 98335
TELEPHONE (253) 858-8606
FAX (253) 858-8646

ORIGINAL

1
2 THE UNDERSIGNED STATES:

3 A fee of \$46.00 is submitted herewith, payable to the Clerk of the Court.

4 As attorney for the above-named Plaintiff, I am making this application for a Writ of
5 Garnishment on said Plaintiff's behalf.

6 The facts are stated as follows:

7 1. Plaintiff has a judgment wholly or partially unsatisfied, against Connect
8 Insurance Agency, Inc., a Texas corporation, and Connect Insurance Agency, Inc., a
9 Florida corporation, entered in United States District Court for Western District of
Washington at Seattle on May 9, 2016.

10 2. The amount alleged to be due and still owing under said judgments,
11 including interest and other statutory costs, is **\$582,951.30**; and has been calculated as
12 follows:

13 Balance of judgment: \$582,565.30; filing fee: \$46.00; answer fee:
14 \$20.00; postage and certified mail: \$20.00; service fee: \$0.00;
garnishment attorney fee: \$300.00.

15 3. Plaintiff has reason to believe, and does believe, that the above-named
16 Garnishee Defendant, **Progressive Northwestern Insurance Company, whose**
17 **address is located at 6300 Wilson Mills Rd., Mayfield Village, OH 44143** is
18 indebted to Defendant Connect Insurance Agency, Inc., a Texas corporation and/or
Connect Insurance Agency, Inc., a Florida corporation, in amounts exceeding those
exempted from garnishment by any state or federal law.

19 4. Garnishee Defendant is not the employer of Defendant, Connect
20 Insurance Agency, Inc., a Texas corporation and/or Connect Insurance Agency, Inc., a
Florida corporation

21 /////

22 /////

23 /////

24 /////

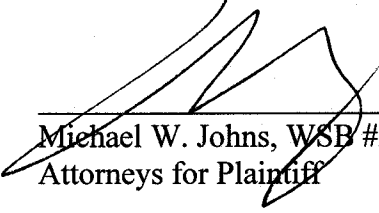
25
26 APPLICATION FOR WRIT
OF GARNISHMENT -- 2

ROBERTS JOHNS & HEMPHILL, PLLC
7525 PIONEER WAY, SUITE 202
GIG HARBOR, WASHINGTON 98335
TELEPHONE (253) 858-8606
FAX (253) 858-8646

1
2 THE UNDERSIGNED CERTIFIES (or declares) under penalty of perjury under the
3 laws of the State of Washington that the foregoing is true and correct.

4 DATED this 24 day of May, 2016 at Gig Harbor, Washington.

5 ROBERTS JOHNS & HEMPHILL, PLLC

6
7 
8 Michael W. Johns, WSB #22054
9 Attorneys for Plaintiff
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

26 APPLICATION FOR WRIT
OF GARNISHMENT -- 3

ROBERTS JOHNS & HEMPHILL, PLLC
7525 PIONEER WAY, SUITE 202
GIG HARBOR, WASHINGTON 98335
TELEPHONE (253) 858-8606
FAX (253) 858-8646